



CONFLICT OF INTEREST CODE

The Political Reform Act, Government Code Sections 81000, et seq., requires SANDAG to adopt and promulgate a Conflict of Interest Code. The Fair Political Practices Commission has adopted a regulation, 2 Cal. Code of Regs. Section 18730, which contains the terms of a standard model Conflict of Interest Code, which can be incorporated by reference, and which may be amended by the Fair Political Practices Commission to conform to amendments in the Political Reform Act after public notice and hearings. Therefore, the terms of 2 Cal. Code of Regs. Section 18730 and any amendments to it duly adopted by the Fair Political Practices Commission along with the attached Appendices in which officials and employees are designated and disclosure categories are set forth, are hereby incorporated by reference and constitute the Conflict of Interest Code of SANDAG.

The persons holding positions listed in the Appendix are designated employees or officials. It has been determined that these persons make or participate in the making of decisions which may foreseeably have a material effect on financial interests. Designated persons shall file statements of economic interests with SANDAG when assuming or leaving their position and annually while holding the position. SANDAG will make the statements available for public inspection and reproduction. (Gov. Code Section 81008). Statements for all designated employees will be retained by SANDAG and the County of San Diego.

APPENDIX A

Designated Positions	Disclosure Categories (See Appendix B)
Members and alternate members of the Board of Directors	1, 2
Members and alternate members of the Five Policy Committees	1, 2
Executive Director	1, 2
Chief Deputy Executive Director	1, 2
General Counsel and Deputy General Counsel	1, 2
Director of Administration	1, 2
Director of Mobility Management & Project Implementation	1, 2
Director of Finance	1, 2
Director of Land Use & Transportation Planning	1, 2
Director of Technical Services	1, 2
Division Directors	3, 4
Chief Economist	3, 4
Special Projects Director	3, 4
Administrative Services Manager	3, 4
Human Resources Manager	3, 4
Administrative Analyst	3, 4
Senior Planner	3, 4
Associate Research Technician/Analyst	3, 4
Associate Planner	3, 4
Senior Engineer	3, 4
Contracts & Procurement Manager	1, 2
Associate Engineer	3, 4

Senior Technician	3, 4
Financial Services Manager	3, 4
Contracts/Procurement Specialist	3, 4
Office Services Specialist	3, 4
Communications Design Supervisor	3, 4
Information Systems Manager	3, 4
Senior Analyst	3, 4
Principal Planner/Project Manager	3, 4
Government Relations Director	1, 2
Executive Assistant	3, 4
Communications Coordinator	3, 4
Pass Sales Manager	3, 4
Financial Planning Administrator	3, 4
Principal Engineer	3, 4
Financial Planning & Budgeting Manager	3, 4
Financial Analyst	3, 4
Business Development Manager	3, 4
Principal Information Systems	3, 4
Administrator of Systems Integration	3, 4
Information Systems Analyst	3, 4
Capital Development Manager	3, 4
Quality Control Management Specialist	3, 4

Type of Consultant	Designated Firm Name / Job Title
Financial Advisor	Public Financial Management

Bond Counsel	Orrick, Harrington, & Sutcliffe /

Positions shall be listed by the name or job title of each person classified as a "designated employee or official" in any contract in which SANDAG enters into with a person or business entity (whether or not a nonprofit entity) for the consulting services. Such a designation will be made in the contract with respect to any person who, in the opinion of SANDAG, may reasonably be expected to make, participate in making, or in any way attempt to use his/her position as a "consultant" to influence a governmental decision in which the person might reasonably be expected to have a financial interest.

APPENDIX B

(Included for reference only – not part of amendment)

When a designated person is required to disclose investment and sources of income, he or she need disclose investments in business entities and sources of income that do business in SANDAG's jurisdiction, plan to do business in the jurisdiction, or have done business in the jurisdiction in the past two years. In addition to other activities, a business entity is doing business within the jurisdiction if it owns real property within the jurisdiction. When a designated person is required to disclose interests in real property, he or she need only disclose real property that is located in whole or in part within or not more than two miles outside the boundaries of the jurisdiction or within two miles of any land owned or used by SANDAG.

Persons designated in Appendix A shall disclose their financial interests pursuant to the appropriate disclosure categories described in the table below.

Disclosure Category	Description
1	All investments and sources of income.
2	All interests in real property.
3	All investments, interest in real property, and sources of income subject to the authority of SANDAG.
4	Investments in business entities and sources of income of the type which, within the past two years, have contracted with SANDAG to provide services, supplies, materials, or equipment.



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The persons holding positions listed in the Appendix are designated employees or officials. It has been determined that these persons make or participate in the making of decisions which may foreseeably have a material effect on financial interests. Designated persons shall file statements of economic interests with SANDAG when assuming or leaving their position and annually while holding the position. SANDAG will make the statements available for public inspection and reproduction. (Gov. Code Section 81008). Statements for all designated employees will be retained by SANDAG and the County of San Diego.

APPENDIX A

Designated Positions	Disclosure Categories (See Appendix B)	
Members and alternate members of the Board of Directors	1, 2	
Members and alternate members of the Five Policy Committees	1, 2	Deleted: our
Executive Director	1, 2	
Chief Deputy Executive Director	1, 2	
General Counsel and Deputy General Counsel	1, 2	
Director of Administration	1, 2	Deleted: Criminal Justice Unit Director
Director of Mobility Management & Project Implementation	1, 2	Deleted: 4
Director of Finance	1, 2	Deleted: Transportation
Director of Land Use & Transportation Planning	1, 2	Deleted: & Administration
Director of Technical Services	1, 2	Deleted: 4
Division Directors	3, 4	Deleted: Public Facilities
Chief Economist	3, 4	Deleted: Research and Information Systems
Special Projects Director	3, 4	Deleted: 3
Administrative Services Manager	3, 4	Deleted: Communications Director
Human Resources Manager	3, 4	Deleted: 4
Administrative Analyst	3, 4	Deleted: 4
Senior Planner	3, 4	Deleted: Services Assistant
Associate Research Technician/Analyst	3, 4	Deleted: Regional
Associate Planner	3, 4	Deleted: Transit
Senior Engineer	3, 4	Deleted: Regional
Contracts & Procurement Manager	1, 2	Deleted: Transportation
Associate Engineer	3, 4	Deleted: Senior Transportation Planner
		Deleted: 3
		Deleted: Transportation Planner

Senior Technician	3, 4	Deleted: Transportation
Financial Services Manager	3, 4	
Contracts/Procurement Specialist	3, 4	Deleted: Accounting/ Deleted: Analyst (title subject to change)
Office Services Specialist	3, 4	
Communications Design Supervisor	3, 4	Deleted: Graphics
Information Systems Manager	3, 4	Deleted: Chief of
Senior Analyst	3, 4	Deleted: Research
Principal Planner/Project Manager	3, 4	Deleted: Transportation
Government Relations Director	1, 2	Deleted: Special Services
Executive Assistant	3, 4	
Communications Coordinator	3, 4	
Pass Sales Manager	3, 4	
Financial Planning Administrator	3, 4	
Principal Engineer	3, 4	
Financial Planning & Budgeting Manager	3, 4	
Financial Analyst	3, 4	
Business Development Manager	3, 4	Deleted: Marketing
Principal Information Systems	3, 4	
		Deleted: Rail Engineer
Administrator of Systems Integration	3, 4	
Information Systems Analyst	3, 4	
Capital Development Manager	3, 4	
Quality Control Management Specialist	3, 4	

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Persons designated in Appendix A shall disclose their financial interests pursuant to the appropriate disclosure categories described in the table below.

Disclosure Category	Description
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